

EXHIBIT 2

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA)
BRYSON, as Administrators of)
the Estate of C.Z.B., and)
as surviving parents of)
C.Z.B., a deceased minor,)

Plaintiffs,)

vs.)

ROUGH COUNTRY, LLC,)

Defendant.)

CIVIL ACTION FILE

NO. 2:22-cv-17-RWS

VIDEOTAPED DEPOSITION OF
WESLEY D. GRIMES
May 9, 2024
10:17 a.m.

Weinberg Wheeler Hudgins Gunn & Dial
3344 Peachtree Road, NE
Suite 2400

Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

1 certainly work on those.

2 Q. Is there anything -- I apologize. Were you
3 done with your answer?

4 A. I was going to say I think that's the only
5 thing I can think of.

6 Q. You anticipated my next question.
7 You're not offering an opinion on the topic
8 of defect in this case; is that right?

9 A. That's correct.

10 Q. So you're not intending to offer the opinion
11 at trial that the Rough Country lift kit was not
12 defective?

13 MR. HILL: Object to the form. Go
14 ahead.

15 THE WITNESS: I have no plans to address
16 that. I'm doing the accident
17 reconstruction.

18 BY MR. MASHMAN:

19 Q. You performed a scene inspection on
20 December 12th, 2022, correct?

21 A. Yes.

22 Q. And on -- I believe it's page 5 of your
23 report -- do you have your report in front of you?
24 I'll wait for you to get to it.

25 A. Okay.

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CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions, and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 5th day of June, 2024.



Marsi Koehl, CCR-B-2424